

Honor F. Bedore
Marathon Ashland Petroleum LLC
539 South Main Street
Findlay, Ohio 45840-3295

Re: Exempt Construction and Operation Status,
E 097-11669-00372

Dear Ms. Bedore:

This letter and attached Technical Supporting Document replaces the previously sent exemption documents because the previous documents were issued with the incorrect plant tracking ID.

The application from Marathon Ashland Petroleum, received on December 15, 1999, has been reviewed. Based on the data submitted and the provisions in Sections 1 and 2 of 326 IAC 2-1, it has been determined that the following tanks, to be located at 255 N. Belmont, Indianapolis, Indiana, is classified as exempt from air pollution permit requirements:

- (a) Two 42,000 gal. asphalt cement ship-built tanks (heated)
- (b) Two 168,000 gal. polymerized asphalt cement

Pursuant to 40 CFR 60.110 Subpart Kb - Standards of Performance for Volatile Organic Liquid Storage Vessels for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984, the permittee must comply with 60.116b part (b) which requires the owner to keep readily accessible records showing the dimension of each tank and an analysis showing the capacity of each tank.

Any change or modification which may increase the potential HAPs emissions to greater than 1.0 tpy of any individual HAP or greater than 2.5 tpy of any combination of HAP or the potential VOC emissions of 5.0 tpy or more from the equipment covered in this exemption must be approved by the Environmental Resources Management Division (ERMD) before such change may occur.

Sincerely,

Robert F. Holm, Ph.D

LA

cc: Matt Mosier, Compliance Team Leader
Mark Caraher, Permits Team Leader

Indiana Department of Environmental Management (IDEM)
Office of Air Management
and
Environmental Resources Management Division (ERMD)

Technical Support Document (TSD) for Exemption

Source Background and Description

Source Name: Marathon Ashland Petroleum LLC
Source Location: 255 N. Belmont
County: Marion
Construction Permit No.: E097-11669-00372
SIC Code: 2951
Permit Reviewer: LA

The Environmental Resources Management Division (ERMD) has reviewed an application from Marathon Ashland Petroleum LLC relating to the construction and operation of four (4) new tanks, consisting of the following equipment:

- (a) two 42,000 gal asphalt cement ship-built tanks [heated]
- (b) two 168,000 gal polymerized asphalt cement

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
NA					

Recommendation

The staff recommends to the Administrator that the construction and operation be approved. This recommendation is based on the following facts and conditions:

Information, unless otherwise stated, used in this review was derived from the application and additional information submitted by the applicant.

A complete application for the purposes of this review was received on 12/15/1999.

Emission Calculations

The source submitted 4.0 tank calculation spreadsheets with their application. ERMD reviewed and verified these and found VOC/HAP emissions are <1.0 tpy.

Total Potential Emissions

Pollutant	Potential Emissions	
	(lb/day)	(ton/yr)
PM	NA	NA
SO ₂	NA	NA
VOC	NA	0.00014 tons/yr
CO	NA	NA
NO _x	NA	NA
Single HAP	NA	NA
Combination of HAPs	NA	0.00009 tons/yr

Potential emissions (as defined in the Indiana Rule) of any regulated pollutants are less than 25 tons per year. Potential emissions of any single HAPs are less than 1.0 tons per year and less than 2.5 tons per year of any combination. Potential VOC emissions are less than 5.0 tons per year.

Therefore, pursuant to the provisions in Indianapolis Air Pollution Control Board Regulation 2 Permits, this source is classified as exempt from air pollution permit requirements.

County Attainment Status

- (a) Volatile organic compounds (VOC) and oxides of nitrogen are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Marion County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Marion County has been classified as attainment or unclassifiable for VOC. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (c) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive PM emissions are not counted toward determination of PSD and Emission Offset applicability.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

These tanks are not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than 100 tons per year,
- (b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
- (c) any combination of HAPs is less than 25 tons/year.

Federal Rule Applicability

- (a) The New Source Performance Standards (326 IAC 12), Subpart Kb of 40 CFR Part 60 appears to apply to this facility because it stores a VOL greater than 40 m³ storage capacity. The control requirement of 60.112b does not apply because kPa is less than 3.5. However, 60.116b requires they keep readily accessible records showing the dimension of each tank and an analysis showing the capacity of each tank.
- (b) There are no NESHAP 40 CFR Part 63 applicable to this facility.

State Rule Applicability

See above for discussion of 326 IAC 12 applicability.

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 189 hazardous air pollutants set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Environmental Resources Management Division and the Office of Air Management (OAM) Construction Permit Application Form Y.

- (a) This source will emit levels of air toxics less than those which constitute a major source according to Section 112 of the 1990 Amendments to Clean Air Act.
- (b) 326 IAC 2-1-3.4 does not apply to this facility because it is not a major HAP source and there are no MACT standards that apply to this source.

Conclusion

The construction of these tanks are to be exempted from air pollution control permit requirements.